

Comments of Larry Langford

Larry Langford is the owner of WGTO AM and WDOW AM both located in Cass County Michigan.

I have read the extensive NPRM on localism and offer these comments.

I can support many of the suggestions made in the NPRM for improvement of local input in the operation of broadcast stations. However it seems that despite good intentions, the end result of some of the suggestions in the NPRM would be to harm relationships with the local community.

I am among those who agreed that many markets no longer do much in the way of local news because competition no longer exists since one company has purchased the bulk of the local outlets or has purchased both “news” stations and then changed the format of one thus eliminating competition to itself. Such was the case in Chicago when CBS became the owner of both all news stations in that market. WBBM was a long time all news station that had been challenged by WMAQ as a news leader.

When CBS and Westinghouse merged WMAQ and WBBM were both under the same ownership and leadership. CBS fired the staff of WMAQ and turned it into a sports outlet moving the staff from lower powered all sports WSCR into the WMAQ facility and changing the called letters of WMAQ. CBS then sold what had originally been the WSCR station.

It has been almost 8 years since the news staff was fired at WMAQ and it can be said that time has proven that without the direct competition from WMAQ, WBBM has pulled back on certain aspects of local coverage as it no longer feels the heat of the younger WMAQ staff racing them on the streets and breaking stories that WBBM was slow to move on.

I was one of the WMAQ news people who lost a job as a result of that CBS move.

But as owner of two small AM stations I am now more concerned about aspects of the NPRM that would affect my operations.

I have no objection to suggestions for a community board to help determine what issues should be addressed. Any station that has a real presence in the community of license probably has the contacts to make this happen very quickly. And there is little or no cost involved.

I must raise STRONG objections to the suggestion that remote operation be terminated and that a full time presence should be maintained at the station during hours of operation.

Let's look at the real world for a moment.

Most locally owned AM stations are struggling to make a buck. Many are only one bad quarter away from going under. Many years ago the FCC allowed daytime stations flea power to operate at night. Most stations took advantage of that since the only real increase in cost was running the transmitter and that was very cheap.

Despite poor coverage and heavy interference, some listeners were able to hear the station and thus enjoy the service. And since the EAS systems were still in operation even at low power, an EAS existed to notify the public of emergencies.

If the Commission requires full staffing of stations when on the air, there will be no way stations like mine can stay on at night. The low power makes it impossible to sell any commercial time to offset hiring anyone. The fact is that when on night power we run commercials as a "bonus" for advertisers that purchase air time during the day.

The result would be that both WGTO and WDW would leave the air at sundown and remain off till the next morning. This would eliminate any EAS service that now exists and would further harm the station since people would turn the dial at sundown and may or may not come back the next morning.

WGTO does a live morning show and then goes to satellite operation for the rest of the broadcast day. Our morning show consists of a live DJ and half hour swap shop program followed by a one hour live interview call in show. And we do these programs when the sun is up in prime time. From 6am to 1030 am!

If I am required to hire people to man the station full time I will not be able to afford the people I now use for the live talk and community affairs shows. That seems like a situation where you cause more problems than you solve. What good is having the station manned 24 hours when we have to eliminate the public affairs live morning show to do it?

If we go off air at night rather than use a fulltime staffer then we lose the benefit of the EAS system. In our county we are the only station the sheriff would be able to activate on EAS. If we are off the air then of course that link would be useless.

In our station we allow the sheriff to have the dial in codes to the remote control system. Using those codes he can take over our

audio from the 911 center and go direct on air in an emergency. Having a staffer there would not improve that system.

Also keep in mind that if a station like mine is forced to hire 24 hour staffers we would in effect be hiring kids that would normally be working at McDonalds. That would be all we could afford. Does the Commission think that would be better than an automated system? We could never afford to hire talent that rivals the professionals we get from our network.

As most small stations do, we concentrate our resources on the morning show and our public affairs programming. We then let the network keep the meters moving unless something big comes up locally. Our people are on the street looking for news and making sales. If something really nasty happens at night or during unattended time, we go on the air via cell phone to the remote interface until someone can get to the station. Our town is very small and our staff people are local. They are never more than ten minutes away from the station. It does not make sense to have full time people who would end up only calling in the heavy hitters anyway. If it is really serious the sheriff or his top deputy can go on air direct and explain what is going on till someone gets to the station and takes over.. This system works and works well.

We realize that the NPRM may be more directed at larger stations that abandon the community of license as they operate as a rim

shot to the larger near by city. They can afford to man a local studio. But those of us that really serve our communities and are doing so at the end of a very short financial rope will be forced to pull back from what we already do just to satisfy regulations that are supposed to guarantee that we do what we already do. If that confuses you don't feel alone it confuses us as well. I caution you not to regulate this new push for localism to the point that you kill localism altogether. In all the hearings that you have held, have you found any people to complain about the little 1 kilowatt AM local station that already does live public affairs? I think not. The complaints are about the 24 hour satellite stations that use nothing but piped in programming or music on hard drive and ignore local issues. Or the local FM that was purchased by a big company and now operates to the benefit of a larger city near the original city of license with the city of license getting nothing more than the hourly mention in the station identification. Those are the operations you should be targeting. If it were not for unattended operation in the afternoon evening and overnight, I would not be in business. We do the best we can with what we have and we make it work. We are a local station we do interface with the community and we get the messages out. We cannot do that if I have to pay kids to sit and watch the meters move all night. I thought we left that alone back in the 70's and 80's why are we going backward on some of these things?

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